

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	CG Docket No. 02-278
Petition of Houghton Mifflin Harcourt)	
Publishers, Inc., Houghton Mifflin Harcourt)	CG Docket No. 05-338
Publishing Company, and Laurel Kaczor)	
for Retroactive Waiver of 47 C.F.R.)	
§ 64.1200(a)(4)(iv))	

**OPPOSITION TO THE APPLICATION FOR FULL COMMISSION REVIEW
FILED BY BAIS YAAKOV OF SPRING VALLEY ET AL.**

On August 28, 2015, the Commission’s Consumer and Governmental Affairs Bureau (the “Bureau”) issued an order (the “Bureau’s Order”) granting to 117 petitioners, including Houghton Mifflin Harcourt Publishers, Inc., Houghton Mifflin Harcourt Publishing Company, and Laurel Kaczor (collectively, “HMH”), a retroactive waiver of the opt-out notice requirement found in 47 C.F.R. § 64.1200(a)(4)(iv). On September 25, 2015, Bais Yaakov of Spring Valley, Roger H. Kaye, and Roger H. Kaye MD PC (the “Applicants”) filed an Application for Full Commission Review (the “Application”) of the Bureau’s Order. The Application advances the same arguments the Applicants have made previously and that have been rejected by the Commission.

Accordingly, HMH opposes the Application for all of the reasons set forth in HMH’s January 20, 2015 Petition for Retroactive Waiver and February 20, 2015 Reply Comments in Support of Retroactive Waiver, and hereby incorporates those arguments in full herein. HMH also opposes the Application for the reasons set forth in Section II of Act, Inc.’s October 9, 2015 Opposition to the Application, and hereby incorporates those arguments in full herein.

HMH respectfully requests that the Commission uphold the Bureau’s Order and reject the Application.

Dated: New York, New York
October 13, 2015

Respectfully submitted,

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